

SUPERIOR COURT BARNSTABLE, SS	
Filed	JAN 25 2019
Clerk	

COMMONWEALTH OF MASSACHUSETTS

BARNSTABLE, ss

BARNSTABLE SUPERIOR COURT  
DOCKET NO: 1872CR00084

COMMONWEALTH

v.

THOMAS LATANOWICH

MOTION FOR A RULE 17 SUMMONS  
DIRECTED TO THE BOURNE POLICE  
DEPARTMENT

Pursuant to Mass. R. Crim. P. 17(a)(2), the Defendant,  
Thomas Latanowich ("Latanowich"), moves the Court to issue a  
summons directing the Keeper of Records of the Bourne Police  
Department, 175 Main Street, Buzzards Bay, MA 02532 to deliver  
the following records, documents, and/or tangible things to the  
Criminal Clerk's Office, Barnstable Superior Court, 3195 Main  
Street St., Route 6A, Barnstable, MA 02630:

1. Copies of any and all files, listings, ledgers, records, timesheets, timecards, or documents (written or electronic) identifying by name, rank, and division all members of the Bourne Police Department on duty on April 13, 2018 between the hours of 8:00 a.m. and 5:00 p.m.
2. Copies of any and all files, listings, ledgers, records, timesheets, timecards, or documents (written or electronic) identifying by name, rank, and division all members of the Bourne Police Department who attended the Defendant's arraignment in Barnstable District Court on April 13, 2018.
3. Copies of any and all records, inter-office memoranda, emails, notices, or documents (written or electronic) pertaining to or concerning the Defendant's arraignment in the Barnstable



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District Court on April 13, 2018.

4. Copies of any and all records, inter-office memoranda, emails, notices, or documents (written or electronic) directing, encouraging, or soliciting members of the Bourne Police Department to attend the Defendant's arraignment in the Barnstable District Court on April 13, 2018.
5. Copies of any and all files, listings, ledgers, records, timesheets, timecards, or documents (written or electronic) identifying by name, rank, and division all members of the Bourne Police Department on duty on August 31, 2018, between the hours of 8:00 a.m. and 5:00 p.m.
6. Copies of any and all files, listings, ledgers, records, timesheets, timecards, or documents (written or electronic) identifying by name, rank, and division all members of the Bourne Police Department who attended the Defendant's arraignment in Barnstable Superior Court on August 31, 2018.
7. Copies of any and all records, inter-office memoranda, emails, notices, or documents (written or electronic) pertaining to or concerning the Defendant's arraignment in the Barnstable Superior Court on August 31, 2018.
8. Copies of any and all records, inter-office memoranda, emails, notices, or documents (written or electronic) directing, encouraging, or soliciting members of the Bourne Police Department to attend the Defendant's arraignment in the Barnstable Superior Court on August 31, 2018.
9. Copies of any and all statements, written comments, memoranda, press releases, media releases, or documents (written or electronic) issued by any agent, servant, or employee of the Bourne Police Department regarding the Defendant, Thomas Latanowich; the decedent, Officer Sean Gannon; or the incident of April 12, 2018.



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The Defendant herein incorporates by reference the attached affidavit of Counsel.

JOSEPH F. KROWSKI JR., ESQUIRE  
30 Cottage Street  
Brockton, MA 02301  
(508) 584-2555  
BBO: 640902

[illegible]



COMMONWEALTH OF MASSACHUSETTS

BARNSTABLE, ss

BARNSTABLE SUPERIOR COURT  
DOCKET NO: 1872CR00084

COMMONWEALTH

v.

THOMAS LATANOWICH

ORDER

It is an ORDER of this Court that the Keeper of Records of the Bourne Police Department, 175 Main Street, Buzzards Bay, MA 02532 shall deliver the following records, documents, and/or tangible things to the Criminal Clerk's Office, Barnstable Superior Court, 3195 Main Street St., Route 6A, Barnstable, MA 02630:

1. Copies of any and all files, listings, ledgers, records, timesheets, timecards, or documents (written or electronic) identifying by name, rank, and division all members of the Bourne Police Department on duty on April 13, 2018 between the hours of 8:00 a.m. and 5:00 p.m.
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District Court on April 13, 2018.

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8. Copies of any and all records, inter-office memoranda, emails, notices, or documents (written or electronic) directing, encouraging, or soliciting members of the Bourne Police Department to attend the Defendant's arraignment in the Barnstable Superior Court on August 31, 2018.
9. Copies of any and all statements, written comments, memoranda, press releases, media releases, or documents (written or electronic) issued by any agent, servant, or employee of the Bourne Police Department regarding the Defendant, Thomas Latanowich; the decedent, Officer Sean Gannon; or the incident of April 12, 2018.



10. Copies of any and all standards, policies, procedures, standard operating procedures, guidelines, or rules of the Bourne Police Department regarding the execution of search warrants, the execution of arrest warrants, the apprehension of fugitives, the arrest of suspects, and/or the use/deployment of canines.

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JUSTICE,  
BARNSTABLE SUPERIOR COURT

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DATED: